



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

October 21, 2011

Dear Interested Party:

Thank you for your interest regarding the Permit to Install application submitted by Extruded Metals, Inc., to the Michigan Department of Environmental Quality (MDEQ), requesting a modification of the brass processing and extrusion processes for the facility located at 302 Ashfield Street, Belding, Michigan.

Pursuant to state and federal requirements, the DEQ held a public comment period that ended with a public hearing on October 10, 2011, on its proposed conditional approval of the permit. The Air Quality Division (AQD) received no written comments during the public comment period, while there were seven verbal comments presented at the public hearing. The Response to Comments (RTC) Document provides our responses to comments received at the public hearing.

After careful consideration of the issues and pursuant to the delegation of authority from the Director of the DEQ, I have approved Permit to Install No. 16-11, with modifications made to the proposed permit which clarify monitoring and recordkeeping requirements of the scrubber systems for the two chip dryers. Please note, the proposed Consent Order will proceed under separate action once both Extruded Metals, Inc. and the AQD have signed the agreement. Comments received at the public hearing resulted in no changes to the proposed Consent Order.

Changes made to the permit include:

Special Condition (SC) IV.2 for FGCHIPDRYERS - added the water flow for the wet scrubber as one of the parameters to be maintained in the range as specified by the manufacturer or as determined during performance testing.

IV. DESIGN/EQUIPMENT PARAMETERS

2. The permittee shall not operate either chip dryer in FGCHIPDRYERS unless the associated cyclone, precooler/wet scrubber and demister are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the precooler/wet scrubber includes maintaining **the water flow**, nozzle water pressure and nozzle air pressure in the range as specified by the manufacturer or as determined during performance testing. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

The following three conditions were changed under FGCHIPDRYERS, section VI. Monitoring/Recordkeeping.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

SC VI.4 - changed the reading from water flow rate to nozzle water pressure. This condition specifies the recordkeeping requirements for SCVI.3.

4. The permittee shall keep, in a satisfactory manner, a record of a reading that will be taken once each shift of the ~~water flow rate~~ **nozzle water pressure** for the precooler/scrubber system for each associated chip dryer that is operating. All records shall be kept on file at the facility and made

available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702, R 336.1901, R 336.1910, R 336.2804, 40 CFR 52.21(d))**

SC VI.5 - added this condition to clarify that the water flow rate needs to be monitored and recorded by a device. This is a new condition.

5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the water flow rate for the precooler/scrubber system when the associated chip dryer is operating. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

SC VI.6 - this condition was previously SC VI.4. This condition specifies the recordkeeping requirements for SCVI.5.

6. The permittee shall keep, in a satisfactory manner, a record of a reading that will be taken once each shift of the water flow rate to the precooler/scrubber system for each associated chip dryer that is operating. All records shall be kept on file at the facility and made available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702, R 336.1901, R 336.1910, R 336.2804, 40 CFR 52.21(d))**

Thank you for your input regarding our review of this permit application. If you have any questions, please contact Mr. Jeff Rathbun, AQD, at 517-241-8072, or you may contact me.

Sincerely,

G. Vinson Hellwig, Chief
Air Quality Division
517-373-7069

cc: Mayor Roger Wills, City of Belding
Mr. Randall DeBruine, Belding City Manager
Ms. Tonda Rich, Ionia County Clerk
Ms. Genevieve Damico, U.S. Environmental Protection Agency, Region 5
Mr. Constantine Blathras, U.S. Environmental Protection Agency, Region 5
Mr. Brad Wurfel, MDEQ
Ms. Heidi Hollenbach, Michigan Department of Environmental Quality
Mr. Jeff Rathbun, DEQ